

RADIUS RESIDENTIAL CARE LIMITED WHISTLEBLOWER POLICY

POLICY STATEMENT

Any employee of Radius Residential Care Limited (“Radius”) that becomes aware of a serious wrongdoing within the organisation is encouraged to report it.

In order to claim the protections provided under the Protected Disclosures Act 2000 (the “Act”), the employee is required to follow the protected disclosure process set out in the steps below.

MEANING OF SERIOUS WRONGDOING

Serious wrongdoing is conduct of serious concern to the employee and includes (but is not limited to) actions or conduct which:

- Puts any person’s health or safety at risk;
- Is corrupt, fraudulent or unlawful; or
- Is in breach of Radius’ Code of Conduct.

REPORTING OF SERIOUS WRONGDOING

Step 1 – Disclosure to Manager

The employee should, in the first instance, disclose any serious wrongdoing to their direct manager to investigate. Such a disclosure should be in writing and should be as specific as possible, including (where possible):

- Names;
- Dates;
- Actions/omissions; and

Any supporting information/evidence.

Step 2 – Disclosure to Senior Executive

If either the:

- manager has taken no action within a reasonable timeframe; or
- employee believes on reasonable grounds that their Manager may be involved in the serious wrongdoing,

they may disclose the information instead directly to the CEO.

Step 3 – Disclosure to Chairperson

If the employee believes the CEO or a director may be involved in serious wrongdoing, the employee may raise his or her concern directly with the Chair of the Board. If the employee believes the Chair of the Board may be involved in the serious wrongdoing, the disclosure may be made to the Chair of the Audit and Risk Committee.

INVESTIGATION

Once suspected serious wrongdoing has been reported, the person receiving the report will consider the information made available and decide on the type of investigation to be undertaken.

PROTECTIONS

Protection under the Act may be claimed by the employee if the report relates to serious wrongdoing in or by Radius, and the employee:

- reports the concern to the appropriate Radius person set out above;
- believes that the information is true or likely to be true;
- wants that information investigated; and
- indicates that disclosure of that information is to be protected under the Act.

REQUIREMENT TO ACT IN GOOD FAITH

The protections offered by the Protected Disclosures Act 2000 and this Policy do not apply where the employee makes a disclosure they know to be false or otherwise acts in bad faith. Allegations made maliciously or in bad faith may result in disciplinary action.

DISCLOSURE TO THE BOARD

Any manager or director receiving a protected disclosure is to report that a disclosure has been made to the Board.

CONFIDENTIALITY

Radius representatives to whom a protected disclosure is made or referred will use their best endeavours not to disclose information that might identify the employee who made the protected disclosure unless:

- that employee consents in writing to the disclosure of that information; or
- where identification of the employee is essential:
 - to the investigation of the allegation;
 - to prevent serious risk to any person's health or safety; or
 - having regard to the principles of natural justice.

Radius is committed to following up on all concerns of serious wrongdoing raised. Concerns will be escalated to senior managers, the CEO, Board, or government authorities if and as appropriate.

REVIEW

This Policy was reviewed and approved by the Board in December 2020 and will be reviewed every two years.